## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Eric T Chandler, Debtor Case No. 21-51021-KMS
CHAPTER 13

## MOTION TO SUSPEND AND RECALCULATE PLAN PAYMENTS

COMES NOW, Debtor, by and through counsel, and moves this Court to suspend their Chapter 13 plan payments, and in support thereof, would show the Court as follows:

- 1. Debtor filed a voluntary petition on 09/27/2021 for relief under Chapter 13 of the Bankruptcy Code.
- 2. Debtor fell behind on payments due to a reduction in income.
- 3. Debtor is requesting this Honorable Court to suspend the past due plan payments, including any ongoing mortgage payments being paid through the plan.
- 4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in March 2023.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
Jennifer Ann Curry Calvillo (MS Bar No. 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

## CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to Suspend Plan Payments was forwarded on February 17, 2023, to the creditor, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Objection.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.